

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

INTERNATIONAL UNION OF OPERATING)	
ENGINEERS, LOCAL 4; INTERNATIONAL UNION)	
OF OPERATING ENGINEERS LOCAL 4 HEALTH)	
AND WELFARE FUND; INTERNATIONAL UNION)	
OF OPERATING ENGINEERS LOCAL 4 PENSION)	
FUND; INTERNATIONAL UNION OF OPERATING)	
ENGINEERS LOCAL 4 ANNUITY FUND,)	
)	
)	Civil Action No. 07-cv-47
Plaintiffs,)	
)	
v.)	
)	
STANLEY EXCAVATION,)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT

Plaintiffs, by and through the undersigned counsel, hereby move for default judgment against Defendant Stanley Excavation, and in support thereof state as follows:

1. The complaint in this matter was filed with the Court on April 9, 2007.
2. Defendant Stanley Excavation was served with a copy of the Summons and Complaint in this action on May 15, 2007.
3. A default was entered by the Court on June 25, 2007 against Defendant Stanley Excavation in matter same.
4. Defendant Stanley Excavation having failed to answer the Complaint within twenty days of service and the Court having entered a default against the Defendant for same, Plaintiffs hereby move for default judgment against Defendant.

Respectfully submitted,

Dated: July 2, 2007

/s/ Jeffrey Neil Young
Jeffrey Neil Young, Esq.
McTeague, Higbee, Case, Cohen, Whitney
& Toker, P.A.
4 Union Park
P.O. Box 5000
Topsham, ME 04086-5000
T: (207) 725-5581
F: (207) 725-1090
jyoung@me-law.com
Counsel to Plaintiffs

So Ordered: _____

United States District Judge

CERTIFICATE OF SERVICE

I, Jeffrey Neil Young, hereby certify that on July 2, 2007, I electronically filed Plaintiffs' Motion for Default Judgment with the Clerk of the Court using the CM/ECF system and that I have sent on date same a copy of said filing to the Defendant at the following address via U.S. Mail: Stanley Excavation, 30 Morrill Street, P.O. Box 321, Buckfield, ME 04220.

/s/ Jeffrey Neil Young
Jeffrey Neil Young, Esq.
McTeague, Higbee, Case, Cohen, Whitney
& Toker, P.A.
4 Union Park
P.O. Box 5000
Topsham, ME 04086-5000
T: (207) 725-5581
F: (207) 725-1090
jyoung@me-law.com
Counsel to Plaintiffs